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Attorney for Debtor(s)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In Re:

Case No. 18-27662-VFP

CHARISE BREEDEN-BALAAM,

Debtor(s).

**REPLY OF COUNSEL TO
TRUSTEE'S OBJECTION TO
VACATE DISMISSAL OF CASE
DATED 4/1/19**

I Douglas Mitchell, Esq., hereby certify as follows:

1. I am the attorney of record in this matter.
2. The Standing Chapter 13 Trustee objects to debtor's motion to vacate dismissal on the for failure to provide proof of post-petition payments to mortgagee Union County Savings Bank "Union Co.*/ Bank of America.
3. Debtor previously submitted the outstanding payments due to Union Co. but as the case was dismissed and no operation of law remained in place for Union Co to receive the adjusted loss mitigation amount, the payments were returned to debtor.
4. Debtor has prepared her March and April 2019 payments totaling \$3,010.00, for submission to Union Co/ Bank of America should this case be reinstated on May 2, 2019. (See Exhibit 1)
5. I as counsel for debtor, failed to appear to March 21, 2019 and pray that my client not be penalized for my calendar mis-management.

6. An un-opposed motion to extend loss mitigation is scheduled to be heard on May 2, 2019 conterminously with this motion.
7. The foregoing facts appear to address all of the trustee's objections as :
 - a. the mortgage payments are present in a certified form prepared for delivery to Union Co./Bank of America
 - b. An Application to Extend Loss Mitigation was filed and will be heard on May 2, 2019.
8. In light of the foregoing, I respectfully ask that the dismissal of this case be vacated, that the instant case be reinstated, and that debtor be allowed to proceed in bankruptcy as she requires continued protection to prevent the Sherriff Sale of her home.

Mitchell Law Offices
/s/ Douglas G. Mitchell
By: Douglas G. Mitchell

Dated: April 25, 2019

EXHIBIT 1



